

LITTLER MENDELSON
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Attorneys for Defendants
Sharon Linari and Tristar Title, LLC
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MELISSA and KELVIN ALMANZAR,

No. 07 CIV 3894 (LTS) (HBP)

Plaintiffs,

-against-

**ANSWER TO THE
SUPPLEMENT TO COMPLAINT**

THOMAS HANKA, SHARON LINARI, TRISTAR
TITLE, LLC and TRISTAR TITLE AGENCY, LLC,

Defendants.

Defendants Sharon Linari and Tristar Title, LLC, also known as Tristar Title Agency, (“Tristar”) (collectively “Defendants”), by and through their attorneys, Littler Mendelson, P.C., hereby answer the Supplement to Complaint of Melissa Almanzar and Kelvin Almanzar (“Plaintiffs”) as follows:

1. Defendants deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Supplement to Complaint.
2. Defendants deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Supplement to Complaint.
3. Defendants admit the allegations contained in paragraph 3 of the Supplement to Complaint.
4. Defendants deny the allegations contained in paragraph 4 of the Supplement to Complaint as Tristar Title Agency, LLC does not exist.

5. Defendants admit the allegations contained in paragraph 5 of the Supplement to Complaint.

6. Defendants deny the allegations contained in paragraph 6 of the Supplement to Complaint.

7. Defendants admit that defendants Sharon Linari and Tristar are not citizens of the State of New Jersey, but lack knowledge or information sufficient to form a belief as to the citizenship of Thomas Hanka and state that Tristar Title Agency, LLC is not a citizen of any state since it does not exist.

8. Defendants admit that Plaintiffs were employed in the State of New York, county of New York and that the alleged acts of discrimination purportedly took place in said state and county, but deny that any discriminatory acts actually occurred.

9. Defendants admit that the amount in controversy exceeds \$100,000 but deny knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 9 of the Supplement to Complaint.

Dated: June 20, 2007
New York, New York

/s/ Andrew P. Marks

Andrew P. Marks (AM-0361)
Jeannine R. Idrissa (JI-1009)
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Plaintiffs,

Case No. 07 CIV 3894 (LTS)

-against-

THOMAS HANKA, SHARON LINARI,
TRISTAR TITLE, LLC and TRISTAR TITLE
AGENCY, LLC

CERTIFICATE OF SERVICE

Electronically Filed

Defendants.

Andrew P. Marks, of full age, hereby certifies as follows:

1. I am a shareholder with the firm of Littler Mendelson, P.C., counsel for Defendants Tristar Title, LLC and Sharon Linari, an individual, in the above-captioned action. I am familiar with the facts set forth in this Certification.

2. On June 20, 2007, I caused a true and complete copy of Defendant Sharon Linari and Tristar Title, LLC's Answer to the Supplement to Complaint to be electronically filed with the Clerk of the District Court using the CM/ECF systems, which sent notification of such filing to the following:

Derek T. Smith (DTS 1747)
Akin & Smith, LLC
Attorneys for Plaintiffs
305 Broadway, Suite 1101
New York, NY 10007
(212) 587-0760

3. I certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Andrew P. Marks
Andrew P. Marks (AM-0361)

Dated: June 20, 2007

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